

# OMNIFLIGHT

December 21, 2000

Federal Aviation Administration  
Attn: Rules Docket, AGC-10  
Office of Chief Counsel  
800 Independence Avenue, SW.  
Washington, DC 20591

RE: Extension to Exemption No. 6653A for FAR 135.143 c (2)

Dear Sir,

In accordance with 14 CFR 11.25, Omniflight Helicopters, Inc. hereby petitions the Federal Aviation Administration for a two year extension to our Exemption No. 6653A. This is an exemption to 14 CFR 135.143 c (2). Part 135.143 c requires that after January 1, 1992 any Transponder not meeting the requirements of TSO-C112 (Mode S) may not be newly installed on any aircraft operation under the provisions of Part 135.

The extension to this is in the best interest of the public from both a safety and an economic perspective. An integral part of the Mode S rule is the ground sensor. These sensors, when combined with Mode S Transponders, better enable Air Traffic Control to track aircraft position thereby reducing the likelihood of a mid-air collision. The ground sensors have not become operational. Without the ground sensors, Mode S Transponders provide no more benefit than Mode C Transponders. Thus, there would not be an unacceptable reduction in aviation safety as a result of the proposed extension to the exemption.

This extension requests that the following aircraft be allowed to operate under the provisions of Part 135 with any TSO-C74b or TSO-C47c Transponder:

Aircraft Type	Registration	Serial Number
BO-105S	N911LF	663
BO-105LS	N315LS	2033
BK-117A-3	N312LS	7061
	N117MH	7112
	N118LL	7097
	N1140H	7078
	N4493X	7038
	N117M	7023
	N527MB	7013
	N117LS	7113
	N911MZ	7098
BK-117A-4	N117LF	7013
	N171MU	7138
	N117NG	7083
	N711FC	7070

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BK-117B-1	N214AE	7206
	N460H	7142
	N311LS	7144
	N170MC	7217
	N117VU	7211
BK-117B-2	N912SM	7150
	N217MC	7195
	N117MK	7196
BK-117C-1	N313LS	7509
	N317MC	7505
Bell 206L-1	N400SL	45235
	N224LF	45199
	N206MH	45426
	N39112	45652
Bell 206L-3	N314LS	51006
	N206AZ	51007
Bell 222-UT	N222HX	47533
	N911MK	47515
Bell 230	N4UV	23019
Beech B200	N75LV	BB-1075
	N417MC	BB-1526
EC-135P1	N911SV	0070
AS-350B-2	N911GF	3140
	N350AZ	3127
	N40751	3154
AS-350B-3	N5230J	3256

Sincerely,

Gordon D. King  
Director of Maintenance  
Omniflight Helicopters, Inc.

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